



RE: follow-up to May 8-10 field meetings
Trueblood, Craig to: Clifford Villa, Robert.Lawrence

05/19/2007 08:12 AM

The 31st is better for me than the 29th. At this point, I can participate in a call anytime on the 31st.

-----Original Message-----

From: Villa.Clifford@epamail.epa.gov
[mailto:Villa.Clifford@epamail.epa.gov]
Sent: Friday, May 18, 2007 4:28 PM
To: Robert.Lawrence@dgsllaw.com
Cc: Trueblood, Craig
Subject: Fw: follow-up to May 8-10 field meetings

Bob:

I received your voicemail suggesting a conf call next Tuesday. However, I will be on travel next week and not available for a call. My earliest availability to talk is Tuesday, May 29. I'm wide open that day as well as Thursday the 31st if you want to schedule something then.

In the meantime, you have the email below from Ed Moreen yesterday, and expect you will give this some thought, confer with your client, and be ready to discuss the following week. If you have any immediate, specific questions, you can also reach me next week via Blackberry.

Thanks.

Cliff Villa
Assistant Regional Counsel
U.S. EPA Region 10
----- Forwarded by Clifford Villa/R10/USEPA/US on
05/18/2007 04:00 PM

Ed
Moreen/R10/USEPA
/US

To

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05/18/2007 08:39
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cc

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Subject

to May 8-10 field

Fw: follow-up
meetings

Gentlemen:

I have to say that it was great to get out in the field with Gary, Daryl, Nick, Brandon, Scott Peterson and Bill Hudson May 8-10. It's unfortunate that Bruce was not able to join us but he's got a competent consultant who can bring him up to date. There really is no substitute for seeing it first hand. While pictures are worth 1000 words, inspection must be worth a 10,000.

Below is a recap on what must be done to revise the EE/CA based on what the current version says, the content of the OU-3 ROD (Basin), the previous work done by UPRR on the Trail and West Wallace Yard, and the various items that we saw last week.

WALLACE YARD

The preferred alternative must address soil capping barriers at 12'' depth to be consistent with the Basin ROD. Here's what we saw last week:

- Open site allowing ease of access.

- Property that is in the community and which has a recreational trail through it and a visitor's center within it, which allow for access by vulnerable populations.

- Property that will be developed in the near future, but the use of which is open for residential purposes.

Residences within the Wallace Yard property must be

remediated.

Residences allowing for access by vulnerable populations.

Visitor's Center discrete sampling areas that have elevated Pb levels

at the surface or within 6" of the surface that require remediation.

These areas require a total 12" cap or removal as appropriate and as

we discussed in the field on May 9.

In summary, the preferred alternative for Wallace Yards must be a 12"

cap over the entire area combined with small discreet removals near the

Visitor's Center. In addition the Hercules Mill foundations must be

cleaned off and decontaminated, the hillside above them will require

stabilization, at the minimum

hydroseed/mulch. Additionally there is a large volume of debris on

and to the east of the foundations that must be dealt with

appropriately. It is anticipated that the details of how that debris

will be dealt with will be in the preliminary design documents.

However, it should

be acknowledged appropriately in the preferred alternative.

SPUR LINES

The spur lines must be capped in a number of areas and addressed in a

manner consistent with the Basin ROD. We saw a number of areas where

residential development is occurring and urban renewal is happening in

small stops like Gem, Idaho! The Silver Valley is in a development boom

and even the Nine Mile and Canyon Creek Canyons are undergoing

redevelopment and new construction. Attached is a table that delineates

what we saw last week and the necessary remedy.

(See attached file: Spur Line Remediation from field recon May

2007.doc)

The final EE/CA must

display this information in figures showing the specific sections of

spur line to be remediated.

The final EE/CA also must provide a revised cost estimate for

remediation of the

spur lines and show the basis for these estimates (e.g., length and

width of functional ROW, volume

of capping material, etc.)). Also, we noted some discrepancies between the actual ROWs observed in the field versus those currently depicted on maps in the EE/CA. These discrepancies must be addressed in the final EE/CA.

WHAT'S NEXT

Gentlemen it's time to get this wrapped up. As we noted in our comment letter the EPA and DEQ have set an objective calling for a finalized EE/CA by September 30, 2007. We can not afford to spend our valuable time vollying back and forth on an appropriate remedy and debating the HHRA. The Basin documents and ROD are clear and the remedy being implemented is consistent with them. We've commented on it in our letter dated May 7, we've talked about it last week, and we display it here in this email. Now it's time for the railroads to deliver the final version of the EE/CA with the appropriate preferred alternative by June 30, 2007.

I anticipate that you'll respond with your acknowledgment of this email and a milestone schedule which lays out your plan to finalize this EE/CA as described here and discussed with you earlier.

(See attached file: Spur Line Remediation from field recon May 2007.pdf)

Ed Moreen

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Craig.Trueblood@klgates.com.